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10			
11	Attorneys for Plaintiff Nuclear Care Partners, LLC		
12	UNITED STATES DISTRICT COURT		
13	DISTRICT OF NEVADA		
14	NUCLEAR CARE RARENERS LLC. N. 1	C N 224 01441 DIA	
15	NUCLEAR CARE PARTNERS, LLC, a Nevada limited liability company,	Case No.: 2:24-cv-01441-DJA	
16	Plaintiff, vs.	STIPULATION AND ORDER EXTENDING TIME FOR PLAINTIFF	
17		TO PROVIDE REPLY IN SUPPORT OF MOTION FOR	
18	RUBEN MENDOZA, an individual; STEPHEN BURR, an individual; and ATOMIC WORKERS ALLIANCE, LLC, a Tennessee limited liability	TEMPORARY RESTRAINING ORDER (SECOND REQUEST)	
19	company company	(SECOND REQUEST)	
20	Disintiff Nuclear Care Doutness II C ("NC	D'') and Defendant Stanhan Draw ("Draw") have	
21	Plaintiff Nuclear Care Partners, LLC ("NCP"), and Defendant Stephen Burr ("Burr"), by		
22	and through their counsel of record, hereby stipulate as follows:		
23	1. NCP, Defendant Atomic Workers Alliance, LLC and Burr are continuing		
24	discussions in good faith and have made substantial progress towards a potential final resolution,		
25	with only a few items left to be worked out and finalized. The parties therefore would like to		
26	continue settlement efforts before moving forward with litigation, including the costs associated		
27	with motion practice.		
28			

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1	2. The parties are committed to devoting resources to potential resolution at this	
2	stage, which the parties believe is close at hand.	
3	3. Accordingly, NCP and Burr stipulate to continue the deadline for NCP to file a	
4	reply in support of its Motion for Temporary Restraining Order (ECF No. 7) February 3, 2025, to	
5	February 10, 2025.	
6	4. This is the Parties' second request for an extension.	
7	IT IS SO STIPULATED. By: /s/Benjamin M. Wegener	
8	DATED this 31st day of January, 2025  Michael M. Edwards, Esq. Nevada Bar No.: 6281	
9	Submitted by: Alicia A. Hagerman, Esq.	
10	Nevada Bar No.: 10891 770 E. Warm Springs Rd. Suite 360	
11	Las Vegas, Nevada 89119	
12	Benjamin M. Wegener, Esq. Colorado State Bar No.: 36952	
13	WEGENER LANE & EVANS, P.C.	
14	743 Horizon Court, Suite 200 Grand Junction, Colorado 81506	
15	Pro Hac Vice Pending	
16	Counsel for Plaintiff	
17	-and-	
18	/s/ Todd J. Dressel	
19	Todd J. Dressel, Esq. McGuireWoods LLP	
20	Two Embarcadero Center, Suite 1300 San Francisco, CA 94111	
21	Counsel for Defendant Atomic Workers Alliance,	
22	LLC and Stephen Burr	
23	TT IS SO ORDERED	
24	IT IS SO ORDERED.	
25	Granted this 31 day of January, 2025.	
26	Mnn	
27	Gloria M. Navarro U.S. District Judge	
28		
20		

**CERTIFICATE OF SERVICE** 1 2 The undersigned, an employee of the law firm of Wegener Lane & Evans, P.C. hereby 3 certifies that on this 31st day of January, 2025, she served a copy of the foregoing via electronic 4 service through the United States District Court for the District of Nevada's ECF System upon 5 each party in the case is registered as an electronic case filing user with the Clerk: 6 Timothy P. Elson, Esq. 7 Nevada State Bar #11559 THE LAW OFFICERS OF TIMOTHY ELSON 8 8965s. Eastern Ave., Suite 382 Las Vegas, Nevada 89123 9 Tim@ElsonLawOffices.com 10 (702) 874-8600 Attorneys for Defendant 11 Ruben Mendoza 12 Ryan J. Works, Esq. MCDONALD CARANO LLP 13 2300 W. Sahara Ave., Suite 1200 Las Vegas, NV 81102 14 rworks@mcdonaldcarano.com (702) 873-4100 15 Attorneys for Defendant 16 Atomic Workers Alliances. LLC 17 Todd J. Dressel, Esq. MCDONALD CARANO LLP 18 2300 W. Sahara Ave., Suite 1200 Las Vegas, NV 81102 19 tdressel@mcdonaldcarano.com 20 (415) 844-9944 Attorneys for Defendant 21 Atomic Workers Alliances. LLC 22 /s/ Becky Dark 23 24 25 26 27 28